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Approved: 

KYLE A. WERSHBA

Assistant United States Attorney

Before: THE HONORABLE KATHARINE H. PARKER
 United States Magistrate Judge
 Southern District of New York

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 UNITED STATES OF AMERICA : COMPLAINT
 :
 : Violations of
 - v. - : 21 U.S.C. § 846; 18
 : U.S.C. §§ 924(c), and 2
 JAN CARLOS GONZALEZ-FERNANDEZ, and :
 RALDIRIS ALEJANDRO BELTRE DIAZ, : COUNTY OF OFFENSE:
 : BRONX
 Defendants. :
 :
 -----X

SOUTHERN DISTRICT OF NEW YORK, ss.:

QIJI WANG, being duly sworn, deposes and says that he is a Special Agent with the Department of Homeland Security, Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE

(Conspiracy to Distribute Narcotics)

1. On or about June 14, 2019, in the Southern District of New York and elsewhere, JAN CARLOS GONZALEZ-FERNANDEZ and RALDIRIS ALEJANDRO BELTRE DIAZ, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JAN CARLOS GONZALEZ-FERNANDEZ and RALDIRIS ALEJANDRO BELTRE DIAZ, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that JAN CARLOS GONZALEZ-FERNANDEZ and RALDIRIS ALEJANDRO BELTRE DIAZ, the

defendants, conspired to distribute and possess with intent to distribute was five kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT TWO

(Use of a Firearm)

4. On or about June 14, 2019, in the Southern District of New York and elsewhere, JAN CARLOS GONZALEZ-FERNANDEZ and RALDIRIS ALEJANDRO BELTRE DIAZ, the defendants, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, namely, the narcotics offense charged in Count One of this Complaint, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), and 2.)

The bases for my knowledge and the foregoing charges are, in part, as follows:

5. I am a Special Agent with DEA. This affidavit is based on my personal participation in the investigation of this matter, my conversations with other law enforcement agents, my interviews of witnesses, as well as my examination of reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

6. Based on my own observations as part of the investigation, my conversations with other law enforcement officers, and my review of DEA reports, I have learned the following, in substance and in part:

a. On or about June 14, 2019, at approximately 7:45 p.m., in the vicinity of a particular exit ramp on Interstate 87 in the Bronx, New York, law enforcement officers conducted a traffic stop of a tractor trailer (the "Truck"). The Truck had on its bed a black Chevy Suburban (the "Car").

b. Law enforcement then approached the cab of the Truck and observed two individuals inside: the driver of the Truck, who law enforcement later identified as JAN CARLOS GONZALEZ-FERNANDEZ, the defendant, and the passenger, who law enforcement later identified as RALDIRIS ALEJANDRO BELTRE DIAZ, the defendant.

c. Upon approaching the cab of the Truck, a law enforcement officer asked GONZALEZ-FERNANDEZ, in sum and substance, whether GONZALEZ-FERNANDEZ had anything illegal in the Truck or Car. In response, GONZALEZ-FERNANDEZ stated, in sum and substance, that there was nothing illegal in the Truck and that law enforcement could search the Truck and the Car.

d. A law enforcement officer then opened a cabinet in the cab of the Truck, located directly behind GONZALEZ-FERNANDEZ and BELTRE DIAZ, and found two suitcases. Inside the suitcases, officers found, among other things: (i) one loaded 9mm Glock model 26 handgun; (ii) one loaded .40 caliber Glock model 27 handgun; and (iii) 17 individually and similarly wrapped packages weighing in total approximately 17 kilograms, of which three were opened to reveal substances that a field test later indicated contained cocaine.

e. Law enforcement officers then put GONZALEZ-FERNANDEZ and BELTRE DIAZ in handcuffs and transported them away from the highway. From GONZALEZ-FERNANDEZ, law enforcement recovered a New York State driver's license in the name of "J. Gonzalez-Fernandez," and from BELTRE DIAZ, a New York State driver's license in the name of Raldiris A. Beltre Diaz.

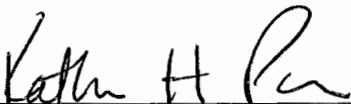
f. Once GONZALEZ-FERNANDEZ and BELTRE DIAZ were in custody, law enforcement continued to search the remainder of the Truck and the Car. Inside the Car, law enforcement found a secret compartment in the floor, inside of which, law enforcement found 16 individually and similarly wrapped packages weighing in total approximately 17 kilograms, of which two were opened to reveal substances that a field test later indicated contained cocaine.

WHEREFORE, deponent respectfully requests that JAN CARLOS GONZALEZ-FERNANDEZ and RALDIRIS ALEJANDRO BELTRE DIAZ, the defendants, be imprisoned or bailed, as the case may be.



Qiji Wang
Special Agent
Drug Enforcement Administration

Sworn to before me this
15th day of June, 2019



THE HONORABLE KATHARINE H. PARKER
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK